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August 28, 2020

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

RE: United States v. Constantinescu
19 Cr. 651 (LTS)

Dear Judge Swain,

I represent Ionela Constantinescu in the above referenced-matter. I write to request permission for Ms. Constantinescu to travel to Tobyhanna, PA.

Ionela would like to go with her husband and children to Pennsylvania so her kids can enjoy some time outside of NYC from September 2, 2020 to September 6, 2020. The family would be staying at 6533 Laural Hollow Dr, Tobyhanna, PA 18466. They would be driving there and back.

I communicated with her pretrial services officer, Rena Bolin and with the government in regards to this request. The government takes no position. Ms. Bolin has no objection.

Thank you for your consideration.

Respectfully,

_____/S/_____
Jacob Mitchell
Ezra Spilke
Counsel for Ionela Constantinescu

The request is granted.
DE#325 resolved.
SO ORDERED
8/28/2020
/s/ Laura Taylor Swain, USDJ

